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Anti-corruption Collective Action
A typology for a new era

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About this Working Paper

Since its first use by the World Bank in 2008, the concept of "anti-corruption Collective Action" has evolved into a well-established best practice to prevent corruption and strengthen business integrity.

This paper captures the specific characteristics of anti-corruption Collective Action that have emerged over time and translates them into an easy-to-grasp typology that reflects both the variety and unifying principles that make up the Collective Action ecosystem. It aims to:

- spark new impetus for engagement;
- open the concept to new stakeholders, topics and environments; and
- support existing initiatives in developing their long-term visions and aims.

In addition to supporting practitioners, updating the typology will also help strengthen the case for Collective Action as a normative corruption prevention practice.

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Executive summary

This Working Paper presents an updated typology for anti-corruption Collective Action, a concept first defined by the World Bank in 2008. The new typology aims to reflect the realities and evolution of Collective Action, which is now becoming a well-established best practice for preventing corruption and strengthening business integrity.

The paper seeks to enhance understanding, encourage broader stakeholder engagement and support the long-term visions of existing initiatives.

The typology builds on the key characteristics of Collective Action that have developed into common denominators over time:

- **Private-sector engagement:** Collective Action is primarily driven by businesses, often in collaboration with governments and civil society.
- **Focus on addressing corruption:** Initiatives target corruption and corruption-related risks.
- **Commitment to raising integrity standards:** Collective Action aims to level the playing field through sustained engagement and concrete actions.

Using these common characteristics, the paper identifies three distinct categories of Collective Action initiatives:

1. **Engagement-focused initiatives:** Centered on trust building, knowledge sharing and collaborative efforts to strengthen business integrity.
2. **Standard-setting initiatives:** Developing industry- or country-specific anti-corruption frameworks, codes of conduct and best practices.
3. **Assurance-focused initiatives:** Incorporating external verification, compliance certification and monitoring mechanisms to ensure accountability.

These categories operate within a Collective Action ecosystem, where initiatives are interconnected and capable of evolving and transitioning between categories. The paper highlights the importance of trust, commitment and private-sector leadership. It also identifies challenges, such as avoiding free riding and ensuring credibility.

The paper finds that Collective Action has evolved into a dynamic and adaptable approach that must remain flexible and responsive to context. Rather than prescribing rigid methodologies, a broader focus on the Collective Action ecosystem is necessary to help stakeholders effectively engage.

Currently, Collective Action faces a critical juncture: the growing number of high-level commitments is contrasted with challenges in translating them into practical collaboration between the public and private sectors. A key concern is preventing Collective Action from becoming a mere tick-box exercise rather than a meaningful mechanism to drive business integrity.

To safeguard its impact, a robust ecosystem anchored by an active community of practice must guide how governments, regional organisations and international bodies integrate Collective Action into their anti-corruption frameworks.

To successfully "mainstream" Collective Action, the community must adopt a shared language and further provide clarity of concept. The typology presented in this paper serves as a building block. There is still a long way to go, requiring concerted efforts from the Collective Action community to come together to define and drive what meaningful progress looks like.

Acronyms and abbreviations

ABC compliance	Anti-bribery and corruption compliance
CAC	(Thai) Collective Action against Corruption
CoST	Infrastructure Transparency Initiative
EITI	Extractive Industries Transparency Initiative
FAFPI	Fight Against Facilitation Payments Initiative
HLRM	High Level Reporting Mechanism
KAM	Kenya Association of Manufacturers
MACN	Maritime Anti-Corruption Network
OECD	Organisation for Economic Co-operation and Development
PACI	Partnering Against Corruption Initiative
UNODC	United Nations Office on Drugs and Crime
UNGC	United Nations Global Compact

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1 Introduction

Since the term "anti-corruption Collective Action"[1] was first coined and defined by the World Bank in 2008, it has matured from an innovative and aspirational concept to a well-established best practice to prevent corruption and strengthen business integrity. Since then, hundreds of Collective Action Initiatives have been set up worldwide to address corruption and corruption-related risks and to strengthen business integrity.

The World Bank's guide for business from 2008 defined Collective Action as follows:

> **"Collective action is a collaborative and sustained process of cooperation between stakeholders. It increases the impact and credibility of individual action, brings vulnerable individual players into an alliance of like-minded organizations and levels the playing field between competitors. Collective action can complement or temporarily substitute for and strengthen weak local laws and anti-corruption practices."**[2]

With its broad definition, Collective Action has always been an inclusive approach with an evolving methodology. This has been essential to its success and relevance in a fast-paced global business environment. For new stakeholders and practitioners interested in engaging in anti-corruption Collective Action initiatives, however, the evolving nature of the concept can make it hard to grasp, and the many different initiatives and their approaches can be overwhelming.

1.1 Rationale for updating the anti-corruption Collective Action typology

In addition to defining the concept, there have been previous attempts to describe different types of Collective Action initiatives (see Annex). The typology, however, has not been reviewed and updated in over a decade and, as a result, does not reflect how Collective Action initiatives have developed over time. This paper aims to update the original typology to reflect the realities and evolution of Collective Action over the past decade.

1 Also referred to in this paper as "Collective Action" for short.

2 The World Bank. 2008. 'Fighting corruption through Collective Action: A guide for business.' At page 4. Available at: https://www.globalcompact.de/migrated_files/wAssets/docs/Korruptionspraevention/Publikationen/fighting_corruption_through_collective_action.pdf (accessed 17 March 2025).

The second key development that warrants a re-examination of the typology is the increase in uptake of Collective Action in international and national standard-setting policy documents, standards and commitments. This is moving Collective Action towards becoming a more normative anti-corruption tool.[3]

In the years since 2008 various descriptions of the typology have been published with an emphasis on its "polymorphic" nature. Professor Mark Pieth, the founder and former President of the Basel Institute on Governance and a thought leader and pioneer of business integrity, remarked that "Collective Action is now a kind of catch-all term for industry standards, multi-stakeholder initiatives and public-private partnerships (PPPs)."[4]

This broad and catch-all terminology that characterised the earlier years of anti-corruption Collective Action served the important function of opening up the marketplace of ideas of Collective Action to practitioners from the private sector, civil society and even government.

During this early phase, guidance for stakeholders on how to engage and develop Collective Action was rather limited; the concept ultimately defined itself through the practices that were collectively established. This development is also referenced in the UN Global Compact Collective Action playbook published in 2021:

> **"There are no two completely identical Collective Action experiences. Looking at past and ongoing Collective Action initiatives, each of these initiatives are themselves a specific type, varying in scope, coverage of issues, participants, levels of enforcement and so on. Collective Action is indeed 'polymorphic' in nature but the World Bank provides a basic classification of the four main types, and this is an important tool for conceptualizing different approaches."**[5]

After 20 years of this organic evolution, it is hard to deny that Collective Action has matured and needs clarification beyond the catch-all definition.

A true watershed moment for moving Collective Action towards becoming a more normative anti-corruption tool was the endorsements included in the 2021 Anti-Bribery Recommendation of the OECD's Working Group on Bribery in International Business Transactions.[6]

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3 Aiolfi, Gemma, Kyle Forness and Monica Guy. 2020. 'Mainstreaming Collective Action: Establishing a baseline.' Available at: https://baselgovernance.org/publications/mainstreaming-collective-action-establishing-baseline (accessed 17 March 2025).

4 Pieth, Mark (ed.). 2012. *Collective Action: Innovative Strategies to Prevent Corruption*. Dike Verlag. At page 3.

5 United Nations Global Compact. 2021. 'Uniting Against Corruption: A playbook on Anti-Corruption Collective Action.' Available at: https://ungc-communications-assets.s3.amazonaws.com/docs/publications/2021_Anti-Corruption_Collective.pdf (accessed 17 March 2025).

6 OECD, *Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions*, OECD/LEGAL/0378.

This recommended that member countries consider Collective Action approaches to:

- support awareness-raising in the private sector (IV.ii)
- address the demand side of bribery (IX.iv)

What differentiates this recommendation from other standard-setting endorsements is that the OEDC Anti-Bribery Recommendations help to guide the process of assessing countries' compliance with the OECD Anti-Bribery Convention as part of the regular country monitoring process. This means that over the next few years data will be collected from a growing number of countries on the existence of Collective Action initiatives and government support/engagement, which will help to inform and guide the relationship between the private sector and public institutions within Collective Action moving forward.

A summary overview of the evolution of anti-corruption Collective Action typologies over the past 12 years is provided in the Annex.

1.2 Aim: make Collective Action more accessible to all stakeholders

This paper seeks to capture the specific characteristics of Collective Action that have emerged over time and translate them into an easy to grasp typology that reflects both the variety and unifying principles that make up the Collective Action ecosystem.

In a nutshell, the updated typology aims to provide clarity around what anti-corruption Collective Action has evolved into over the past decades to:

- spark new impetus for engagement;
- open the concept to new stakeholders, topics and environments; and
- support existing initiatives in developing their long-term visions and aims.

In addition to supporting practitioners, updating the typology will also help strengthen the case for Collective Action as a normative corruption prevention practice.

A major hurdle for Collective Action to cross over successfully into the anti-corruption mainstream is the catch-all nature that Collective Action has evolved from. The original typology lacks clarity on engagement requirements such as the expected level of commitment, and on the existing common characteristics. This in turn makes it difficult to attach incentives to Collective Action initiatives, address risks and effectively embed Collective Action in existing frameworks, policies and anti-corruption laws.

Many Collective Action initiatives aim to engage with the public sector. They call on governments to recognise and offer incentives to companies that demonstrate their commitment to doing business with integrity and to effectively implement their anti-bribery and corruption (ABC) compliance. While there are some interesting examples of Collective Action engagement with governments[7] resulting in reduced bureaucracy, fast-track procedures and the ability to bid for public tenders, this is not yet the norm.

As a result, there is a gap between the growing number of high-level commitments to Collective Action at the international and national level, and the reality on the ground where we still see a lack of clarity about how these commitments can be translated into practice between the private and public sectors.

A clear and comprehensible typology that reflects the current status quo of the Collective Action ecosystem will enable policymakers to better understand the initiatives operating in their jurisdictions and how they can support and integrate them into existing anti-corruption frameworks.

Achieving the common goal of a fairer business environment through Collective Action requires a delicate balance between the commitment expected of participating companies and the benefits/incentives they get from being a part of a Collective Action initiative. Striking this balance is necessary to manage the risk all Collective Action initiatives face of whitewashing and falling prey to the "free rider problem"[8]. If companies are not required to demonstrate their commitments and still receive the reputational benefits of being a member of a Collective Action initiative this can enable free riders and harm the reputation of the initiative as being a tool to whitewash companies that publicly say one thing and conduct business in a way that does not live up to the standards set in these kinds of Collective Action initiatives.

1.3 Structure of this paper

Section 2 of this paper explains how we went about updating the typology, describes the common denominators of Collective Action and explains what distinguishes it from other forms of collaboration.

Section 3 provides an overview of the new typology in the context of the larger Collective Action ecosystem, including visualisations. Section 4 fleshes out the three categories and provides examples. Some reflections and brief outlook round off the paper in Section 5.

The annex provides a historical overview of the concept of Collective Action.

7 See: Scarlet Wannenwetsch. 2022. 'Engaging the private sector in Collective Action against corruption.' Available at: https://baselgovernance.org/publications/engaging-private-sector-collective-action-against-corruption (accessed 17 March 2025).

8 https://plato.stanford.edu/entries/free-rider/.

2 Characteristics of Collective Action

It is important to maintain continuity in the terminology used in the Collective Action community and to keep it simple. This is critical to ensure a common language and understanding that builds on pre-existing work, platforms and communities rather than creating parallel and competing definitions, methodologies and discussion forums.

The term "anti-corruption Collective Action" and the 2008 World Bank definition are widely accepted and used. They are referenced and embedded in a multitude of key international standard-setting policy documents as well as in many national anti-corruption strategies and guidance documents.[9]

Another advantage is that the current definition of Collective Action does not go into specifics or provide clear parameters of what constitutes a Collective Action. As such, it is able to capture the wide variety of initiatives that have developed over the years. The downside to this broad and catch-all type of definition is the lack of guidance and clarity it provides in its application.

2.1 Basis for revising the Collective Action typology

Rather than updating the definition, which in many ways is the foundation that initiatives over the past fifteen years have built on, it is sufficient to update the typology, i.e. the way in which initiatives can be categorised. A revised typology should build on what we have – a strong foundation for Collective Action provided by its broad definition – and reflect the current Collective Action landscape.

The updated typology formulated in this paper categorises Collective Action initiatives through the lens of common denominators that have been identified by analysing existing initiatives.

The common denominators used as a basis for determining the typology hypothesis were tested against the largest dataset of Collective Action initiatives available globally, the B20 Collective Action Hub database.[10]

The database was launched in 2013 as part of the Business 20 (B20) mandate to capture business-led integrity initiatives in order to inform and support practitioners on the ground. Since then, the database has collated 343 Collective Action initiatives representing a wide range of industries in nearly 100 countries.[11]

9 Anti-corruption Collective Action is advocated in standards, guidance and, for example, through activities supported by UNODC, OECD, EU, UN Global Compact and Brazil B20 Integrity and Compliance Taskforce.

10 B20 Collective Action Hub. n.d. 'Collective Action Initiatives.' Available at: https://collective-action.com/explore/initiatives/ (accessed 17 March 2025).

11 Numbers reflect the status of the database in March 2025.

The review of the 343 entries in the Collective Action database validates our hypothesis for both the common denominators and the typology presented in this paper: All initiatives can be successfully categorised accordingly with no outliers identified in the dataset.

So, what exactly are these common characteristics that have emerged from the self-defining process that Collective Action has gone through? And what distinguishes Collective Action initiatives from lobbying efforts or multi-stakeholder initiatives more generally?

To answer this question, first, let's capture and review the key characteristics that have developed into common denominators over time and can be found in all initiatives despite the great variety and many unique traits, approaches and tools that have developed through and within Collective Action.

2.2 Common characteristics of Collective Action

First, let's review the key characteristics that have developed into common denominators over time and can be found in all initiatives despite the great variety and many unique traits, approaches and tools that have developed through and within Collective Action.

Based on the broad parameters of the 2008 definition in conjunction with previous research on mainstreaming Collective Action[12] and the assessment of the 343 Collective Action initiatives we can deduce that Collective Action:

- **engages, focuses on, or is driven by the private sector**, and facilitates the dialogue or engagement between the private sector and another stakeholder such as government or civil society;
- addresses a **corruption or corruption-related issue**; and
- aims to **raise standards** of business integrity and level the playing field in an industry or country/region through **sustained engagement** and **demonstrated commitment** towards raising those standards and addressing the issues collectively.

The third characteristic captures the common aims that make up the building blocks of Collective Action: (a) building trust through engagement, (b) working to influence the business environment by setting standards, and (c) ensuring a level of commitment needed to address the free rider problem.

12 Aiolfi, Gemma, Kyle Forness and Monica Guy. 2020. 'Mainstreaming Collective Action: Establishing a baseline.' Available at: https://baselgovernance.org/publications/mainstreaming-collective-action-establishing-baseline (accessed 17 March 2025).

2.3 What distinguishes Collective Action from other collaborative efforts

The common characteristics can help us to understand, what distinguishes Collective Action from other collaborative forms of stakeholder engagement, such as lobbying and multi-stakeholder initiatives.

Lobbying, for example, refers to the attempt by an individual, or in this case the private sector to influence the decision of government/the public sector for the benefit of their interest group.[13]

There are two elements that distinguish Collective Action from lobbying efforts:

1. Addressing and reducing corruption is for the common good. While there are additional business benefits associated with companies working together to tackle corruption, the positive impact of the engagement extends beyond the involved companies.

2. In a Collective Action initiative, the collective business interests are balanced with a clear commitment from the engaged business actors on how they will contribute to addressing the specific corruption risk identified. Balancing the incentives with commitment is critical to protect the credibility of the initiative in all of its activities. The World Bank's definition points to this when it states that Collective Action "increases the impact and credibility of individual action".

Lobbying is a one-way street aimed at influencing the behaviour of government decision-makers; Collective Action aims to balance influence and benefits with commitments made on both sides with positive outcomes for society at large.

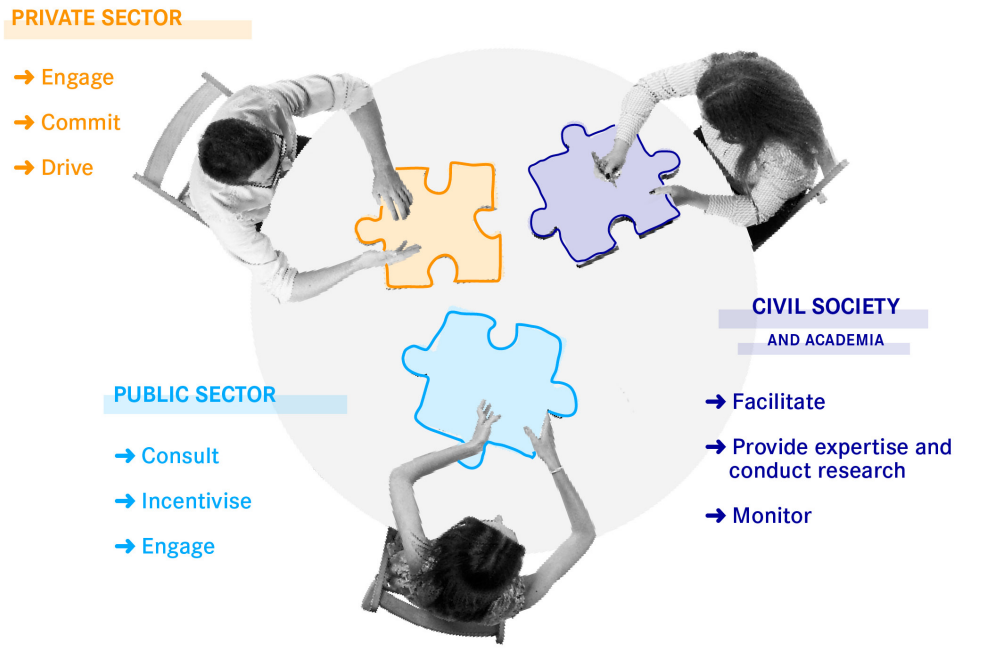
Circling back to the common denominators outlined above, this comparison highlights the importance of the focus of Collective Action on addressing corruption as an aim that extends beyond the individual company and industry interests. It also emphasises the importance of a demonstrated commitment to raising standards of business integrity as a core Collective Action characteristic.

The difference between Collective Action and **multi-stakeholder initiatives**[14] is more categorical in nature as Collective Action is a subcategory of multi-stakeholder initiatives. What distinguishes the two is the clear stakeholder focus of Collective Action. While many multi-stakeholder initiatives have strong government or civil society leadership, Collective Action specifically focuses on the private sector and private sector issues and needs when it comes to raising standards of business integrity.

13 Based on the Encyclopaedia Britannica definition of "lobbying", updated 29 January 2025, available at: https://www.britannica.com/topic/lobbying (accessed 3 March 2025).

14 Multi-stakeholder refers to different stakeholders – including governments, regional groups, local authorities, non-governmental actors, international institutions and private-sector partners – who are working together to find a collective solution for a certain problem. See Dodds, Felix. 2015. 'Multi-stakeholder partnerships: Making them work for the Post-2015 Development Agenda.' Available at: https://www.un.org/en/ecosoc/newfunct/pdf15/2015partnerships_background_note.pdf (accessed 17 March 2025).

The private sector plays a central role in Collective Action, ranging from active engagement to pronounced commitment and leadership in initiatives. Civil society (broadly defined to also include entities such as academic and research organisations) and the public sector tend to take on a more supportive role, as reflected in the stakeholder overview for Collective Action below.



PRIVATE SECTOR

ENGAGE
- ... with other industry players on compliance and corruption prevention
- ... with governments to co-develop anti-corruption frameworks and monitoring systems
- ... with civil society for expertise in developing an initiative

COMMIT
- ... to harmonise and raise business integrity through tailored anti-corruption standards, tools and procedures
- ... to develop a trust-based dialogue to share experiences, struggles and good practices
- ... to provide resources to develop and sustain initiatives

DRIVE
- ... the implementation of standards and commitments through self-assessment, monitoring and certification
- ... greater impact by expanding initiatives to supply chains, SMEs, competitors and others
- ... and consider expanding initiatives to broader ESG topics such as human rights

PUBLIC SECTOR

CONSULT
- ... with the private sector through institutionalised dialogue platforms
- ... with other government entities and experts on the benefits of Collective Action
- ... international organisations to streamline anti-corruption strategies with international guidelines

INCENTIVISE
- ... companies to engage in corruption prevention/Collective Action initiatives for a better investment climate
- ... companies to invest in compliance and Collective Action
- ... the implementation of industry standards by calling for robust monitoring mechanisms

ENGAGE
- ... and demonstrate leadership by actively participating in Collective Action
- ... to develop anti-corruption tools such as Integrity Pacts, High Level Reporting Mechanisms and public-private integrity initiatives
- ... and establish Collective Action as the go-to approach for collaborating with the private sector

CIVIL SOCIETY AND ACADEMIA

FACILITATE
- ... knowledge sharing between companies and other stakeholders
- ... and help set up governance structures for initiatives
- ... communication between peers by sanitising and filtering information to alleviate antitrust concerns

PROVIDE EXPERTISE AND CONDUCT RESEARCH
- ... on best practices in other contexts
- ... on indicators for measuring the effectiveness of initiatives and standards
- ... to help develop tailored standards, policies and guidelines

MONITOR
- ... progress through tailored assessments
- ... and implement sanctions in cases of non-compliance
- ... and manage conflicts of interest

Figure 1: Anti-corruption Collective Action stakeholder overview, as developed collaboratively by participants at the 4th International Collective Action Conference in 2022.[15]

15 Basel Institute on Governace. 2022. '4th International Collective Action Conference: How to mainstream Collective Action to achieve a clean, fair and sustainable business environment for all.' Available at: https://baselgovernance.org/publications/4th-international-collective-action-conference-how-mainstream-collective-action (accessed 17 March 2025).

The comparison between multi-stakeholder initiatives and Collective Action highlights the importance of the stakeholder focus. This stakeholder focus allows us to tailor the Collective Action language, approaches, priority areas and mode of working to speak to and fit into the business environment and its key stakeholder demographic. The key stakeholder for Collective Action is the private sector – not because it's more important in the fight against corruption than other stakeholders, but because in the vast majority of Collective Action initiatives it is the private sector that is making commitments towards achieving the aims and goals of the initiative.

Prominently positioning the private sector in the fight against corruption is in the interest of all stakeholders given its influence, capacity/resources and understanding of the global, regional and local business contexts. These strengths can all be leveraged through Collective Action to make the anti-corruption landscape more effective, competitive and resilient.

2.4 The importance of trust

In addition to the common characteristics described above, there is an additional key element that underpins Collective Action and the updated typology: the importance of **trust and trust building**. This is also part of the common aims that make up the building blocks of Collective Action. Trust building happens throughout all development stages of any successful initiative.

Building trust among competing companies in a given industry or between the private sector players in a particular country or region is a prerequisite for sharing experiences and knowledge of corruption risks. It's also essential for committing to work together to better address them.

The same goes for the engagement with governments. A certain level of understanding and trust is required to move beyond superficial interactions between the private sector and government towards real collaboration.

The multi-faceted and ever-changing nature of corruption also demonstrates and reinforces the importance of trust. Trust allows initiatives to evolve and adapt to the changing anti-corruption and business environment in which they operate. It can ensure sustained engagement and commitment towards achieving the initiative's goals in the face of evolving corruption.

Building trust is not an easy task and is one of the reasons why it can take a considerable amount of time for initiatives to get off the ground.

3 Collective Action typology 2.0: overview

Based on the identified common denominators, we propose three categories (or types) of Collective Action initiatives. They are interconnected by the common aims that make up the building blocks of Collective Action mentioned above:

a. building trust through engagement;

b. working to influence the business environment by setting standards; and

c. ensuring a level of commitment needed to address free rider risk.

All Collective Action initiatives are operating on a spectrum, with varying degrees of focus on each Collective Action building block. The updated typology tries to capture the aim that a Collective Action is particularly focused on. As a result, the type clusters relate directly to and reflect the building blocks of Collective Action:

a. Engagement-focused initiatives

b. Standard-setting initiatives

c. Assurance-focused initiatives.

To illustrate this, let's take the example of assurance-focused initiatives: They build trust and involve setting standards, but the focus is clearly on ensuring accountability through the development of assurance procedures, including external validation of the implementation of the agreed upon standards. The other building blocks (engagement and standards) are still important and part of the process, but not the focus and goal of what the initiative is trying to achieve.

Section 4 will dive deeper into the specifics, activities and practical examples of the three Collective Action type clusters to allow for a more comprehensive overview of the Collective Action landscape.

Figure 2 shows the breakdown of all 343 initiatives on the B20 Collective Action Hub according to the outlined typology. While all initiatives clearly assigned to one of the three types of Collective Action, a few have a clear dual focus, which reflects that they are in the process of transitioning between categories.

The categorisation of each initiative will be integrated into the database to ensure transparency and to make the findings of this paper available to inform, support and guide practitioners and interested stakeholders on their Collective Action journey.

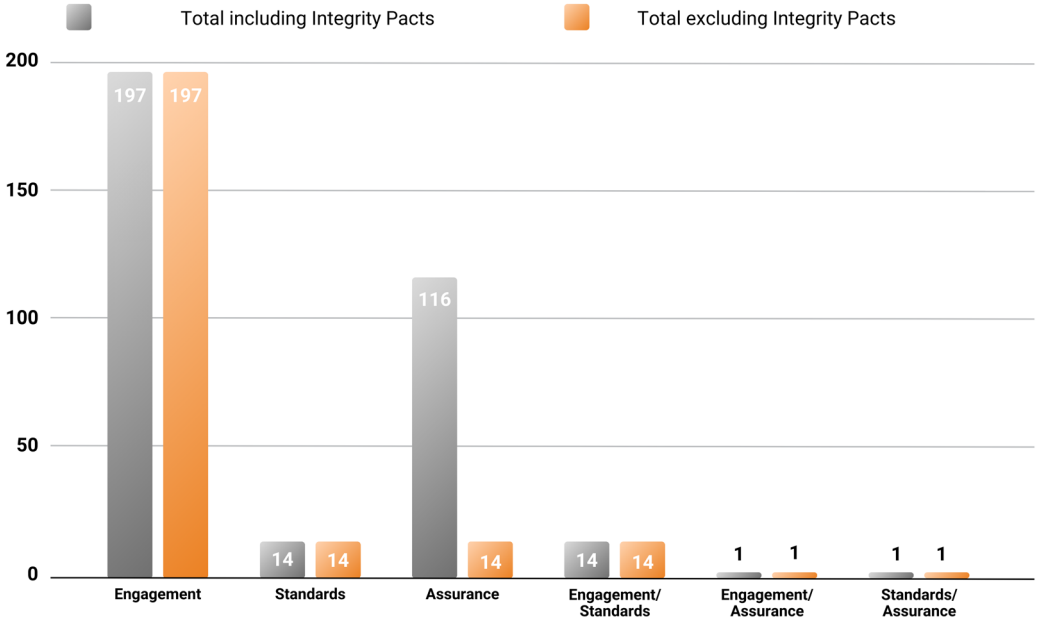


Figure 2: Breakdown of the 343 assessed initiatives on the B20 Collective Action Hub according to the typology.

3.1 Visualisation of the new Collective Action typology

To reflect the underlying importance of trust, sustained engagement and commitment, and the potential for the evolution of Collective Action initiatives, the typology is visualised through a circular model, see Figure 3 below. The arrows between the three types of initiatives reflect the potential of initiatives to transition and evolve into other categories over time.

Figure 3: Visualisation of the Collective Action typology 2.0.

The three categories of initiatives are also represented circularly to reflect that they are fully sufficient within themselves. We do see trends of transitions between categories.

The circular representation both of Collective Action as a whole and of the individual categories lets us reflect that there is no hierarchy when it comes to Collective Action. An evolution or transition of an initiative between the categories does not automatically indicate an increase in impact or effectiveness. What it can indicate is a healthy level of trust and commitment present in an initiative as a transition requires additional time and resources from all participants.

The circular visualisation also reflects the importance of sustained engagement, challenging the notion that there is a clear end point to Collective Action. When it comes to tackling corruption, there is no "finish line". Corruption tends to evolve and adapt and Collective Action initiatives need to adapt accordingly.

3.2 The Collective Action ecosystem

Another way of understanding the circular representation of Collective Action is to think of Collective Action initiatives not as insulated, but as integrated into a larger ecosystem of initiatives that make up the Collective Action community of practice. That is, a community connected by the common denominator of initiatives that are self-sufficient and hierarchically independent.

Thomas and Ritala (2021) describe ecosystems as "communities of interdependent yet hierarchically independent heterogeneous participants who collectively generate an ecosystem value proposition" and that "often emerge through collective action, where ecosystem participants interact with each other and the external environment".[16]

Applying this definition of ecosystem to the Collective Action landscape highlights the influence internal and external factors have on the opportunity and appropriateness of a Collective Action approach. A Collective Action approach is highly dependent on the environment or context in which the initiative operates. This means that each initiative needs to respond to and take account of the internal and external environment and identify the most impactful approach within the given context. These factors are therefore key to understanding the hierarchical independence of initiatives within the Collective Action ecosystem.

Figure 4 below presents how the Collective Action ecosystem is built up, starting at the centre with the individual stakeholders that make up a Collective Action initiative: Private Sector, Government and Civil Society (representing the third sector). The next level represents the three categories into which initiatives can be grouped using the typology. Together they make up the broader Collective Action community. The outer band adds the relevant contextual factors, such as the business environment and anti-corruption landscape in which the Collective Action community/initiatives operate.

16 Thomas, L. D. W. and P. Ritala. 2021. 'Ecosystem Legitimacy Emergence: A Collective Action View.' *Journal of Management* 48 (3): 515-541. https://doi.org/10.1177/0149206320986617 (Original work published 2022).

What is important to note is that the impact of these factors on Collective Action is not a one-way street. Collective Actions also aims to impact the anti-corruption and business environment, which is visualised by the irregular delimitation between the Collective Action community and the environment in which it operates.

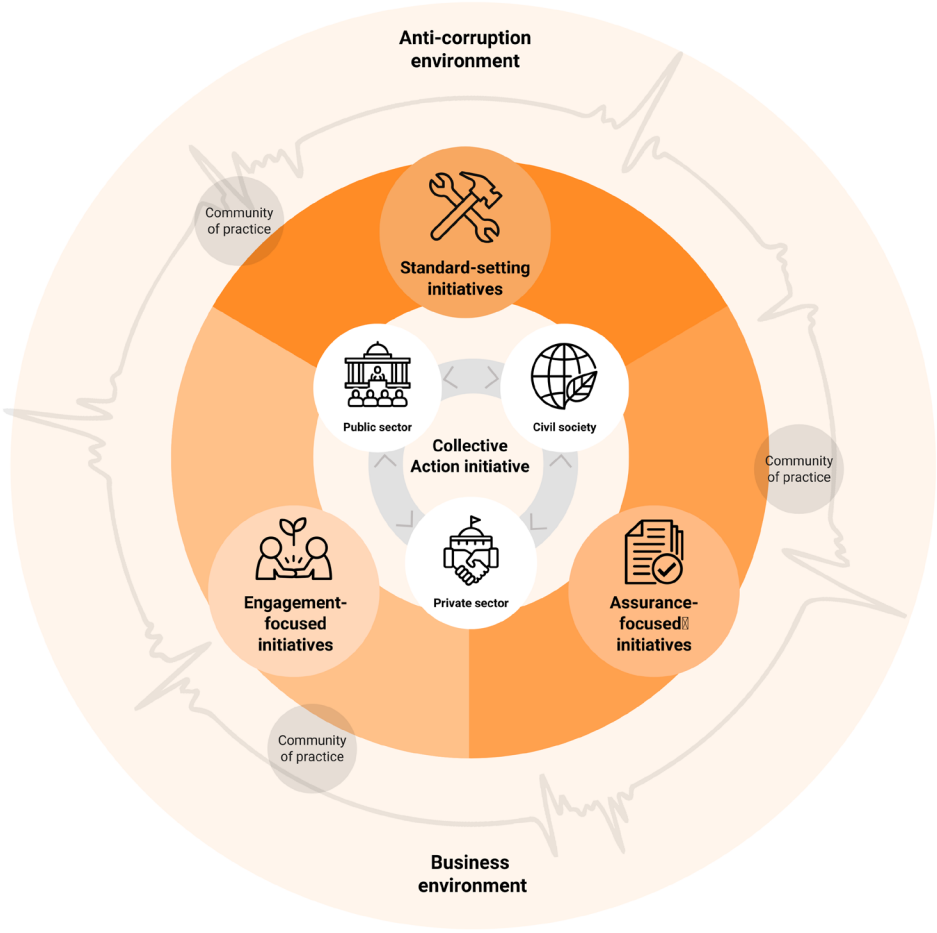


Figure 4: Visualisation of the Collective Action ecosystem.

Collective Action is built on the premise of **increasing "the impact and credibility of individual action" and bringing "vulnerable individual players into an alliance of like-minded organisations"**.[17] An alliance that enables all actors to address common corruption issues more effectively. Applying this beyond the individual initiative to the Collective Action community or communities, the same principle applies: the stronger the community, the less vulnerable the individual initiatives and the greater the potential impact on the anti-corruption and business environment.

Given the variety of contexts, stakeholder constellations and approaches to Collective Action, alliances of like-minded Collective Action players, i.e. Collective Action communities of practice, can take any number of forms. The aim of visualising the Collective Action typology within the broader Collective Action ecosystem is to highlight the potential of Collective Action and its communities of practice, including those perhaps not yet realised.

17 See World Bank definition, footnote 2.

4 The three main types of Collective Action

Let's dive into the three main categories of Collective Action initiatives that we have identified and dig into the specific characteristics, focus areas, activities, and also their relationship/connection with each other as part of the larger Collective Action ecosystem.

The case studies outlined in the three subsections below are drawn from publicly available sources and are not comprehensive representations or qualitative assessments of the selected initiatives. Rather, they intend to highlight some commonalities and differences across the three types of Collective Action and to further illustrate the diversity inherent in the Collective Action ecosystem.

4.1 Engagement-focused Collective Action initiatives

Despite there being no hierarchy between the Collective Action categories, the engagement-focused initiative is an obvious place to start as engagement and trust building is an essential building block for all Collective Action initiatives.

Main focus

Any Collective Action initiative that in its essence focuses on **building trust and a shared understanding of corruption risks and how to address them** in a given context or industry can be considered an engagement-focused initiative.

Activities

Activities of engagement-focused initiatives include but are not limited to:

- Development and signature of joint declarations of intent
- Joint capacity and learning initiatives
- Industry-specific working groups focused on corruption or corruption-related topics
- Joint events and awareness-raising activities
- Joint activities and collaboration to develop integrity tools to address identified corruption risks and priorities

Commitment

The focus on engagement and collaboration is found not only in how the activities are implemented but also in how commitment is demonstrated by the participants. Continuous and active engagement in the activities and meetings is an important indicator of commitment and helps to underpin the trust and honour system that is typically applied in these initiatives.

A trust/honour system can be viewed as a low bar to protect an initiative from free riders and stakeholders merely interested in window dressing. Nonetheless, publicly committing to and allocating resources for sustained engagement does present a threshold that should not be underestimated. Setting clear expectations about what active engagement in ongoing activities and meetings looks like can be a simple way to weed out organisations that do not meet this threshold of commitment.

It's important to remember here that initiatives need to strike a delicate balance between provided incentives/benefits and required investment/commitment. If there is an imbalance, for example, if the benefits clearly outweigh the required commitment and resource investment, this will attract free rides. It leaves the initiative without a clear line of defence, which can threaten the reputation of the Collective Action. If, on the other hand, the required commitment and resource allocation significantly outweigh the potential benefits of engaging, the initiative will struggle to attract members or participants.

For engagement-focused initiatives most of the activities focus on sharing good practices, building capacity and developing tools together, and as such might not warrant more burdensome and costly commitment requirements.

The engagement-focused category is by far the most widely represented category of Collective Action initiatives. They make up well over half of the 343 initiatives on the B20 Collective Action Hub, reflecting the importance of trust and engagement as well as a lower bar in terms of commitment that needs to be demonstrated compared to the other two categories.

As Collective Action initiatives are all operating on a spectrum of the Collective Action building blocks outlined above, there are also some engagement-focused initiatives that have aspirations to grow into standard or assurance-focused initiatives but have not yet made the transition.

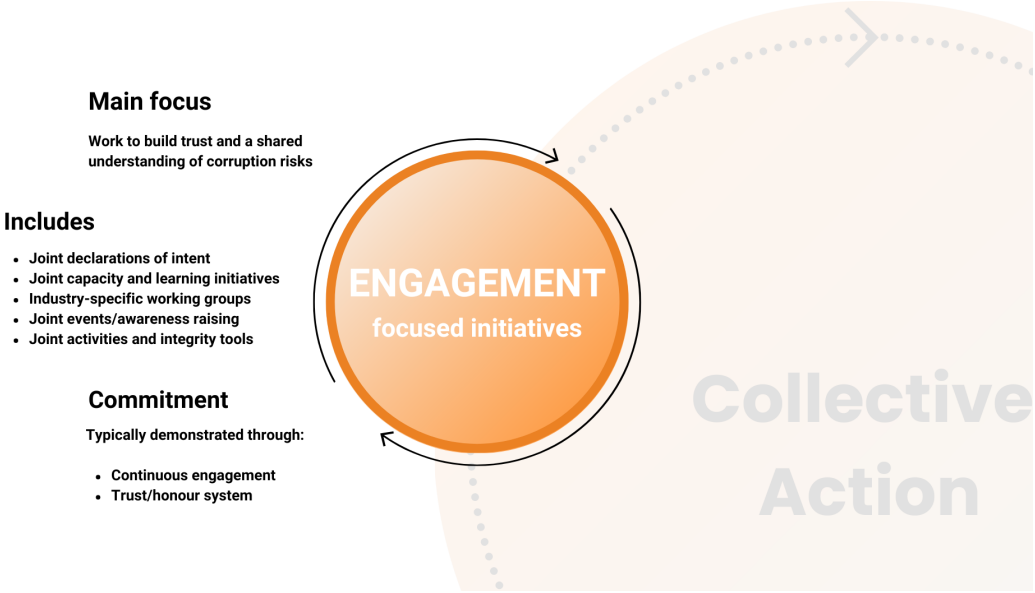


Figure 5: Engagement-focused Collective Action initiatives typology spotlight.

4.1.1 Case studies: unpacking engagement-focused Collective Action initiatives

Two short case studies aim to further unpack what engagement-focused initiatives can look like in practice and illustrate the commonalities that allow them to be categorised together.

Case Study 1: Partnering Against Corruption Initiative (PACI)[18]

In its own words: "Founded in 2004 by Chief Executive Officers from World Economic Forum partner companies, the Partnering Against Corruption Initiative (PACI) is committed to embedding trust and integrity into corporate strategy... It leverages a multi-stakeholder approach to tackle systemic corruption and business integrity challenges across industries globally. PACI's 2030 vision unites leaders to promote a transparent, accountable, and sustainable business environment and its mission emphasizes moving from commitments to tangible action. The Initiative leverages a sector-specific approach, acknowledging that challenges and solutions differ across industries. This approach allows the PACI Community to create solutions that address industry-specific corruption risks."

PACI is based on the Partnering Against Corruption Global Principles for Countering Corruption (PACI Principles).[19] Companies that adopt these principles commit to (paraphrased):

- An active leadership commitment to "zero tolerance of corruption in all its forms";
- Building an internal commitment to a culture of zero tolerance of corruption
- Fostering transparency within the organisation and in stakeholder interactions
- Complying with applicable laws and regulations
- Encouraging business partners to uphold the same ethical standards
- Engage in PaCI and other Collective Action initiatives

To join PACI, companies sign a commitment letter. Signatories are expected to provide data on their implementation and to actively participate in meetings. The taskforce meetings offer an opportunity to share best practices and develop practical tools and guidance documents.

18 See https://www.weforum.org/communities/partnering-against-corruption-initiative (accessed 17 March 2025).

19 World Economic Forum. 2016. 'Partnering Against Corruption Initiative: Global Principles for Countering Corruption.' Available at: https://www3.weforum.org/docs/WEF_PACI_Global_Principles_for_Countering_Corruption.pdf (accessed 17 March 2025).

Case Study 2: The Fight Against Facilitation Payments Initiative (FAFPI)[20]

The Fight Against Facilitation Payments Initiative (FAFPI) is both a **network of like-minded companies for "**sharing and building best practices and a **data-driven** initiative, collecting and using data as a mechanism for effective change."

The FAFPI reporting mechanism

FAFPI collects data on actual instances of facilitation payments (i.e. evidence) through its reporting mechanism. Members report actual demands for facilitation payments to the secure system. FAFPI can then approach governments and present evidence of what is considered crimes in most countries, seeking to persuade relevant stakeholders to act.

Figure 6: The FAFPI reporting mechanism.

When comparing these two initiatives, the differences seem more apparent than their commonalities. PACI is a global integrity initiative based on a declaration of intent of its members across industries and countries. FAFPI is an initiative focusing on one specific corruption-related topic, facilitation payments, and seeks to address it through a data-driven approach combined with a practical resolution process informed by the anonymised data collected.

Despite these different focus areas, methodologies and stakeholder constellations, active engagement and the resulting trust of its participants is foundational and a focus for both initiatives. For PACI the importance of engagement has made it into the participation requirements, members are required to participate in a certain number of meetings to not get delisted. For FAFPI the critical importance of engagement and trust is more inherent in what the initiative is trying to achieve, with regards to both the best practice sharing platform and even more so their data-driven resolution model. Trust and engagement are key to populating the anonymous database as well as when it comes to working with local authorities to resolve reported issues.

20 See https://fafpi.org (accessed 17 March 2025).

What the comparison of these initiatives shows is that engagement is at the heart of both the demonstration of commitment and the way in which goals are achieved, and tools, approaches and policies are developed.

4.2 Standard-setting Collective Action initiatives

Main focus

Standard-setting initiatives focus on developing tailored anti-corruption standards and policies for a specific industry or a specific country context.

Standard-setting initiatives aim to lift the standard of business integrity by agreeing on a common standard that goes beyond the legally required minimum or dives into more detail on a specific corruption risk/risk area. These initiatives can be understood as a form of self-regulation in an environment where standards vary between companies, country policies and laws, which can lead to corruption-enabling gaps and an uneven playing field between competitors.

To be able to set a standard, a standard-setting initiative needs to bring together a representative number of private sector actors that, through their market share, have the ability to affect how business is conducted and what is considered an industry standard. So, to effectively function as a standard-setting Collective Action initiative, the composition of the initiative itself is as relevant as the influence it can have on its context.

Because Collective Action is practical in nature, one of the key benefits of this type of initiative is that it can be developed in a risk-responsive manner. Rather than developing high-level standards across the board, standard-setting initiatives focus on addressing specific risks through concrete and tailored industry-driven standards.

Activities

Activities for standard-setting initiatives include but are not limited to developing:

- Industry or country-specific Codes of conduct
- Industry or country-specific policies/compliance standards and guidance documents
- Self-assessment tools to evaluate the implementation of the developed standards
- Implementation guidance/tools

Commitment

For standard-setting initiatives, the commitment from members is more formalised than in engagement-focused initiatives. It can be demonstrated through:

- Communicating publicly the commitment to implementing agreed-upon standards, for example on the company website, initiative website or in annual reports.
- Integrating developed standards into internal compliance processes.
- Regular self-assessments against the agreed-upon standards, and reporting progress back to the other members of the initiative.

When assessing the initiatives on the B20 Collective Action database, we find only a small number of standard-setting initiatives. It is by a significant margin the smallest group out of the three categories. This most likely has to do with the challenge of bringing together a representative number of private sector actors to be able to set standards, as well as the increase in demonstrated commitment required from members.

We also see several engagement-focused initiatives that are interested in or have transitioned towards becoming a standard-setting initiative. Similarly, there are a number of initiatives that have transitioned or are looking to transition from a standard-setting initiative to an assurance-focused initiative. Overall, we can see the most transitional movement into and out of the standard-setting Collective Action category.

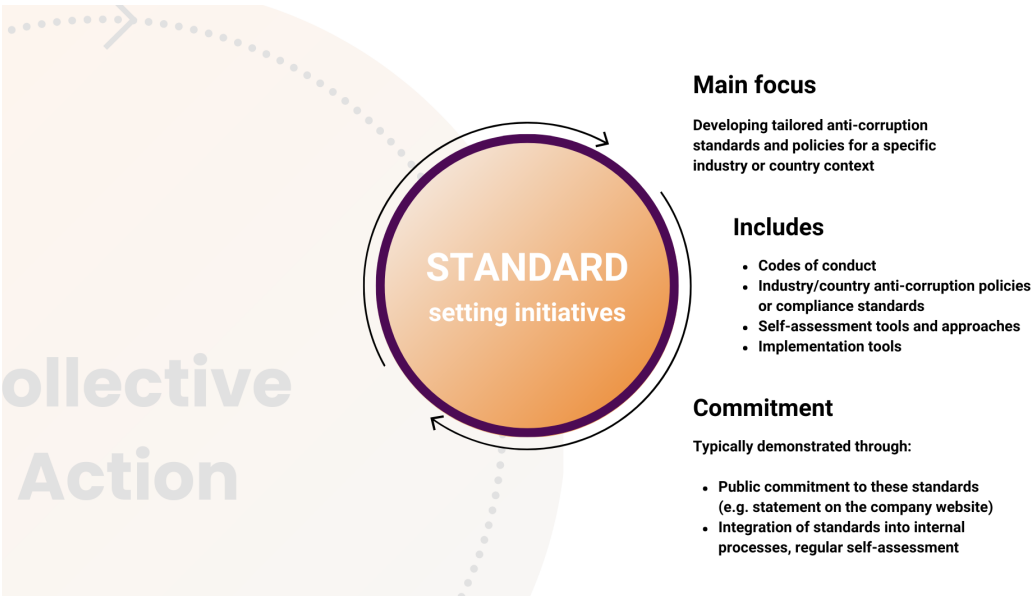


Figure 7: Standard-setting Collective Action initiatives typology spotlight.

4.2.1 Case studies: unpacking standard-setting Collective Action initiatives

Case Study 3: The Maritime Anti-Corruption Network (MACN)[21]

In its own words, the "Maritime Anti-Corruption Network (MACN) is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large. Established in 2011 by a small group of committed maritime companies, MACN has grown to include over 220 companies globally and has become one of the pre-eminent examples of collective action to tackle corruption. MACN and its members work towards the elimination of all forms of maritime corruption by:

- raising awareness of the challenges faced;
- implementing the MACN Anti-Corruption Principles and co-developing and sharing best practices;
- collaborating with governments, non-governmental organizations, and civil society to identify and mitigate the root causes of corruption; and
- creating a culture of integrity within the maritime community."

The MACN Collective Action approach has proven to be efficient in countering corruption in challenging environments such as Argentina, Bangladesh, Egypt, India, Indonesia, Nigeria, Pakistan and Ukraine.

Case Study 4: Code of Ethics for Business in Kenya[22]

The Code of Ethics for Business in Kenya is a long-term initiative for and from the business community in Kenya. It is intended to enable a cogent level of commitment by business to contribute to building a globally competitive and prosperous Kenya.

The development and promotion of the Code was led by the Kenya Association of Manufacturers (KAM). The Code is a guide to ethical business practices in Kenya especially among the private sector, and has grown from 44 signatories when launched in 2012 to over 840 signatories in 2024. A new digital platform was also launched "where companies can readily access information and tools to support them in their Anti-corruption compliance journey".

The signatories to the Code are accountable to their stakeholders by way of annual disclosures, which demonstrate their efforts against bribery and corruption in their operations, including the supply chain. KAM monitors this and ensures that these disclosures are made on time. However, the content of disclosures is not verified.

21 See https://macn.dk/ (accessed 17 March 2025).

22 See https://kam.co.ke/global-compact-network-kenya-kam-and-kepsa-relaunch-code-of-ethics-for-business-in-kenya/ (accessed 17 March 2025).

These two very different initiatives illustrate the diversity of standard-setting Collective Action initiatives. MACN, an industry-specific initiative, not only sets standards for the maritime industry at a global level backed by its members. It also works to set standards by addressing industry-related corruption issues at a national level in the industry's priority contexts through their country-focused Collective Action programmes.

The Kenya Business Ethics Code focuses on setting a standard for the business community at a national level. Although co-developed by the Kenya Association of Manufacturers, the Code is not industry-specific, but is aimed at the Kenyan business community as a whole.

Establishing a representative standard for all businesses at the country level is an ambitious goal that requires a clear business case for engagement and access to a representative number of business actors. For this reason, the majority of successful standard-setting initiatives focus on sectoral standard-setting, as it is easier to formulate a clear business case and bring together a representative number of actors.

4.3 Assurance-focused Collective Action initiatives

Main focus

Last but not least, the assurance-focused category captures all initiatives that are prioritising the implementation and assurance of agreed-upon integrity standards through a Collective Action approach.

What differentiates this category from the standard-setting initiatives is that the implementation is assessed and can be verified via an external independent party.

Activities/approaches

Activities and types of approaches include, but are not limited to:

- Compliance certification approaches
- Integrity Pacts
- Compliance monitoring mechanisms including reporting mechanisms

Commitment

The commitment to the implementation of agreed-upon standards is typically demonstrated through an external certification/verification process or contractual obligation which can be externally monitored to ensure compliance.

In comparison with the other categories of Collective Action, assurance-focused initiatives require the highest level of commitment not only in terms of expectation of engagement and contribution to joint activities or

the development of standards. Uniquely, this type of initiatives requires a commitment that is verified through an external assessment of the implementation of said standards within each member's systems and processes.

One of the benefits of this type of Collective Action is that the external validation process can help to root out free riders. Given the strong engagement and externally verified implementation of standards, assurance-focused initiatives also offer a clear and measurable value proposition that can put members in a stronger negotiation position in their interactions with customers and government counterparts. It should however be mentioned that these benefits come along with a significantly higher level of time and financial resource commitments from its members. External validation comes with a cost and has to be regularly conducted to be credible.

The assurance-focused category of Collective Action accounts for a third of all Collective Action initiatives captured in the B20 Collective Action Hub. This is partially influenced by the high number of Integrity Pacts that are included in the database.

Integrity Pacts are one of the oldest forms of Collective Action; they have been around since the 1990s. They are typically applied to specific public procurement processes and as such have a clear start and end date, which has resulted in a higher number being recorded.

The overall trend of standardisation and certification for international businesses is also felt in the Collective Action space and is reflected by the relatively high number of assurance-focused initiatives. Businesses grapple with shifts in the regulatory landscape and increased customer expectation, for example regarding their supply chain due diligence, and are looking to processes and approaches that can help them better manage their risks.

Figure 8: Assurance-focused Collective Action initiatives typology spotlight.

4.3.1 Case studies: unpacking assurance-focused initiatives

Case Study 5: Thai Collective Action against Corruption Initiative[23]

The Thai Collective Action against Corruption initiative (CAC) was founded in 2010 as a platform for companies in Thailand to tackle corruption through Collective Action. It was co-founded by the country's eight leading organisations in the private sector: The Thai Chamber of Commerce, the Joint Foreign Chambers of Commerce in Thailand, the Thai Listed Companies Association, the Federation of Thai Industries, the Federation of Thai Capital Market Organisations, the Thai Bankers' Association, the Tourism Council of Thailand and the Thai Institute of Directors Association (IOD), which takes a leading role in driving the initiative.

To strengthen business integrity in Thailand, the Thai CAC has developed a unique voluntary certification process that helps companies apply strong anti-corruption compliance standards.

To date, more than 1,400 major companies in Thailand are signatories, and around 500 companies have been certified by the Thai CAC.

Rationale

The initiative leverages its vast membership, which covers the majority of key players in each industry willing to demonstrate their commitment to clean business practices through an external and verifiable certification process. CAC is working towards aligned standards for business to close existing gaps and reduce the space for and acceptance of corrupt practices, with the aim of creating a fairer and more equitable business environment.

All of Thailand's commercial banks have gone through the Thai CAC's certification process, and numerous insurance, brokering, asset management, pharmaceutical and marketing companies have become signatories. The Thai CAC is now one of the largest Collective Action initiatives in the world by membership.

Approach and assurance of compliance

Members that sign-up to the initiative first go through a rigorous pre-assessment and guided alignment process with the Thai CAC standards and are subject to regular independent audits and external monitoring processes in order to ensure compliance and enforcement.

continued over

23 See https://www.thai-cac.com/en/ (accessed 17 March 2025).

What distinguishes this Collective Action initiative from other Compliance certification approaches such as ISO 37001 is that the standards have been tailored to the Thai country context and have been supported and co-developed by the business community. As a business community initiative, Thai CAC not only provides the standards and the vertifying they also offer community support to companies on their way to becoming signatories or getting certified, all on a not-for profit basis.

Figure 9 shows the Thai CAC's visualisation of the initiative's approach.

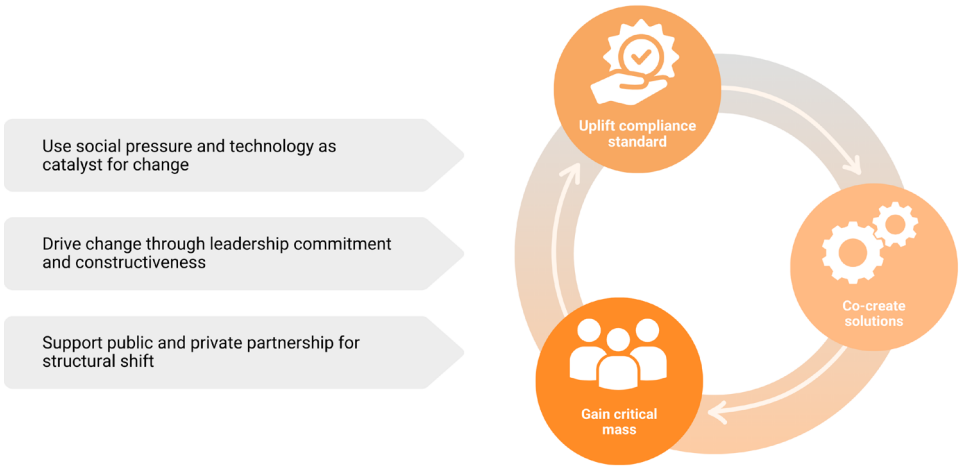


Figure 9: The Thai CAC's approach.

Case Study 6: The High Level Reporting Mechanism in Colombia[24]

A High Level Reporting Mechanism (HLRM) is a tool that provides a constructive approach to address the corruption risks inherent in complex public procurement processes. The implementation of a HLRM aims to improve foreign direct investment by creating trust and transparency in business. An HLRM allows companies to adapt to different legal and institutional contexts quickly and flexibly to achieve practical results.

The HLRM concept was developed by the Basel Institute on Governance, the OECD and Transparency International, together with a group of multinational companies seeking alternatives to cumbersome and time-consuming judicial processes. However, the HLRM is not a legal device. It is a tool of a preventive nature that implements conflict resolution mechanisms, determines its own governance and functions in a complementary manner to law enforcement institutions. Complementarity with law enforcement and control institutions is necessary depending on the context in which the mechanism is implemented.

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24 See https://collective-action.com/explore/hlrm/ (accessed 17 March 2025).

Colombia was the first country to implement an HLRM, piloted in relation to public tenders in its nationwide 4G road construction project. It fulfilled a triple function:

- Gather alerts on behaviour, technical problems or even situations that could indicate a possible solicitation of bribes in interactions between bidders (in a public procurement context), i.e. companies and governments.
- Provide complainants with an alternative, quick and low-cost resolution mechanism that allows a commercial transaction or public procurement process to proceed without undue disruption.
- Analyse, inform and advise governments on issues relevant to business, including the modification of laws, regulations or procedures to reduce opportunities for corruption.

Based on the experience of the 4G HRLM pilot in Colombia, the following features were identified:

- **Complementarity**: An HLRM is an alternative to administrative and criminal procedures, without replacing or undermining them. The HLRM aims to find a quick, pragmatic and effective response to resolve bribery requests or other anomalies mainly in public procurement processes. Its overall objective is to contribute to reducing the cost of doing business by mitigating reputational risks and ensuring the credibility of projects, and ultimately ensuring quality infrastructure.
- **Multi-stakeholder**: An HLRM is a coordinated approach between the different actors involved. However, the structure, procedures, economic sectors and entities subject to an HLRM vary from country to country.
- **Adaptability**: An HLRM must take into account the legal and policy framework of the country. There is no "one size fits all", so the HLRM adapts to existing institutions and laws according to the objectives pursued.
- **Legitimacy**: An HLRM requires political commitment from the highest levels of government to ensure its effective implementation and legitimacy, especially as it sits between law enforcement procedures and business interests.

For both the Thai CAC and the Colombian HLRM, ensuring the implementation of commitments made is a defining element, although they differ significantly in terms of context/industries, stakeholder constellations, objectives and overall methodology.

Assessing the balance between commitment/investment and benefits/incentives for both initiatives, the rationale for securing commitments that can be externally verified becomes clear. For companies participating in the Thai CAC certification

model, their membership fees, commitment and certification costs are balanced with the benefit of better responding to pressure and expectations from international customers to manage the corruption risk in their supply chains. At the same time, the initiative helps to level the playing field in the Thai business context. In such an environment, the consequences of free-riding by even a small number of members can jeopardise the entire initiative, making assurance of compliance an essential element of the initiative's success.

The HLRM model in Colombia takes a different approach to providing assurance by balancing the obligations and benefits of engagement for both public and private sector entities involved in the infrastructure procurement process. The HLRM is implemented and enshrined in an Integrity Pact, which contractually sets out the integrity and transparency requirements to which all bidding companies and procuring authorities commit for the duration of the bidding and execution of the public works.

In terms of assurance, Integrity Pacts provide clear consequences for non-compliance by the parties, which may include re-tendering, blacklisting or fines. The incentives for the private sector to sign up are clear: access to large and lucrative public infrastructure projects. The addition of a bespoke reporting tool, introduced by the HLRM, allows bidding companies in particular to raise concerns, and provides assurances to the private sector about the integrity and transparency of the procurement process. This includes a commitment by public sector actors to an agreed complaints procedure with clear timelines, and external independent experts to ensure a fair and impartial review of any complaints made.

For both initiatives, the actual or potential costs of non-compliance are so significant that they far outweigh the additional resources needed to ensure implementation.

5 Reflections and outlook

In reviewing existing Collective Action initiatives and their evolution over time, it is clear that Collective Action is an approach in flux which needs to maintain its flexibility, practicality and contextual responsiveness. As a result, it will inevitably outgrow the typology outlined in this paper.

It may be more appropriate to shift beyond the individual, methodological and process-oriented lens and focus more on understanding the broader Collective Action ecosystem. For this reason, the typology is not *prescriptive* but rather *descriptive*. It is a clear, useful framework that will help stakeholders in the Collective Action ecosystem to enter, navigate and contribute to the community.

Collective Action seems to be at a crossroads, balancing the inherent risk of moving from an organic bottom-up approach towards a more normative set-up. A gap is forming between the growing number of high-level commitments to Collective Action at international and national levels and the reality on the ground. There, we still see a lack of clarity about how these commitments can be translated into practice. A key question arises: How can Collective Action be protected from becoming a tick-box exercise?

This is where a strong Collective Action ecosystem, underpinned and driven by an active community of practice, comes in. It is essential to steer how national governments, regional organisations and international standard-setting bodies implement the concept. This will ensure that Collective Action is not watered down to a catch-all phrase covering any multi-stakeholder effort with the private sector.

Looking ahead, the role of governments in incentivising and engaging in Collective Action will be crucial in the next phase of this journey.

Annex: Historical overview

The World Bank definition and typology (2008)

In addition to proposing the seminal definition of anti-corruption Collective Action quoted in this paper, the 2008 World Bank guide for business presents a typology of ways that companies can join efforts to fight bribery and other forms of corruption through Collective Action. It includes practical suggestions on how to do so. The four types of Collective Action encompass a broad range of efforts as depicted in a quadrant differentiating two axes. One axis highlights the timeframe context (whether Collective Action is tied to a singular project and/or transaction or is rather a long-term initiative), while the other axis differentiates between levels of enforcement (whether anti-corruption commitments are voluntary or externally enforced).

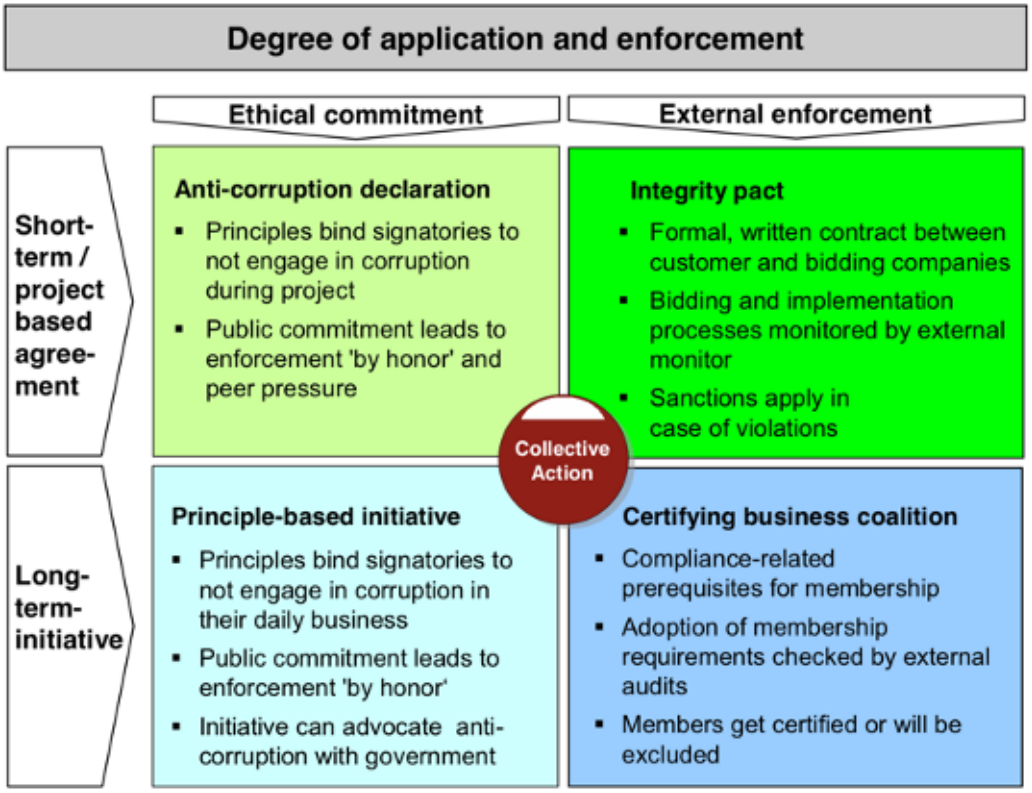

Figure 10: Collective Action typology presented in the World Bank guide for business (2008, p. 15).

The World Bank's four categories are as follows:

- **Anti-corruption declarations**: The World Bank guide designates anti-corruption declarations as punctual integrity measures foreseen for short-term projects or transactions. They require private and public-sector actors to express a public commitment to abide by anti-corruption standards, but do not establish any mechanism for monitoring or enforcing compliance with such voluntary pledges.
- **Principle-based initiatives**: Principle-based initiatives reflect longer-term multi-stakeholder efforts to set anti-corruption standards in either

a particular industry or country. The core elements proposed here are (i) the elaboration of shared principles; and (ii) the voluntary public commitment to abide by them.

- **Integrity Pacts**: Transparency International pioneered the concept of Integrity Pacts as written contracts between public procurement agencies and bidding companies who agree that their compliance with integrity standards for a procurement process will be monitored by an external party and violations will result in sanctions. The World Bank guide endorses this specific understanding of Integrity Pacts as a stand-alone typology of Collective Action.
- **Certifying business coalitions**: Members who join a certifying business coalition agree to subscribe to, and internalise in their compliance programmes, specific integrity rules that will be certified through some form of external audit. Failure to meet the standards results in exclusion from the certifying coalition.

The 2013 B20 task force study building on the World Bank typology

The Business 20 (B20) – the business arm of the G20 that has convened annually since 2010 – has frequently expressed support for promoting anti-corruption Collective Action since Mexico's G20 Presidency in 2012. In that year, the B20 Task Force on Improving Transparency and Anti-Corruption recommended engaging in anti-corruption Collective Action as a key priority for the business community. To that end, the B20 gave the Basel Institute the mandate to establish the B20 Collective Action Hub to centralise information on Collective Action initiatives.

In light of the 2012 B20 Task Force recommendation, the G20 Anti-Corruption Working Group requested the B20's assistance to better understand the concept of anti-corruption Collective Action. It commissioned the Basel Institute and the International Business Leaders Forum to prepare a report for their consideration during the Russian Federation's G20/B20 Presidency.

The B20 Task Force study draft submitted in May 2013[25] compiles and presents an array of anti-corruption Collective Action efforts and classifies them according to a revised typology adapted from the World Bank guide.

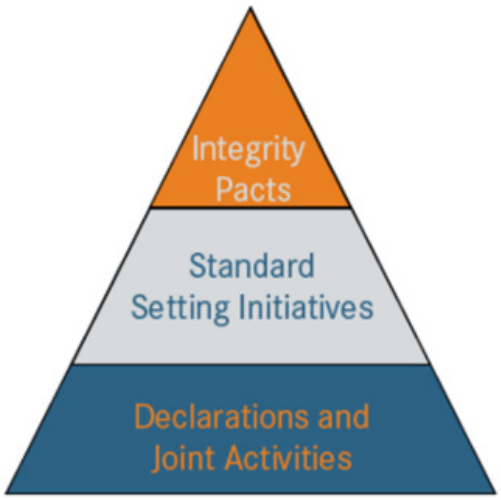

Figure 11: Collective Action typology set out in the B20 Task Force Study (2013).

The B20 Task Force study conceptualises anti-corruption

25 B20 Task Force on Improving Transparency and Anti-Corruption. 2013. 'Design and Enforcement of Voluntary Anti-Corruption Agreements in the Private Sector.' Available at: https://baselgovernance.org/publications/design-and-enforcement-voluntary-anti-corruption-agreements-private-sector (accessed 17 March 2025).

Collective Action as a pyramid, rather than a quadrant with the following three layers (from the bottom-up):

- **Declarations and joint activities**: The bottom layer of the B20 Task Force pyramid encompasses any non-binding statement or pledge in support of anti-corruption and integrity efforts made by a group of companies with or without government buy-in. It is therefore much broader than the two categories of ethical commitments foreseen by the World Bank guide. Given that such declarations are typically accompanied by joint activities that seek to raise awareness of the integrity standards adopted in the declaration or pledge, this category also includes any type of joint compliance trainings or awareness-raising efforts.
- **Standard-setting initiatives**: Efforts in this middle layer of the B20 Task Force study's pyramid are ones that demonstrate an increased level of commitment by participating members. The most common form of anti-corruption Collective Action foreseen here is where companies seek to harmonise anti-corruption standards in codes of conduct. Such codes of conduct might arise among participating companies in the same industry or be cross-sectoral within a defined geographic region. There is a slight tension in this category: the B20 Task Force study suggests that codes of conduct have a greater level of implementation than voluntary pledges or declarations. At the same time it acknowledges that some codes of conduct are also purely voluntary, whereas some others have some form of external enforcement.
- **Integrity Pacts**: The B20 Task Force study adopts an expansive view of the top-level of the Collective Action pyramid, which is intended to depict the "strongest" versions of Collective Action initiatives, i.e. those with clearly defined enforcement mechanisms. As such, this category includes both Integrity Pacts as originally conceptualised by TI (and endorsed as a stand-alone Collective Action category in the World Bank guide) alongside long-term industry-specific multi-stakeholder initiatives that go beyond project-based procurement. The Extractive Industries Transparency Initiative (EITI) and the Infrastructure Transparency Initiative (CoST) are offered as two examples of Integrity Pacts within this category.

One of the main reasons the B20 Task Force study morphed the World Bank guide's quadrant into a pyramid was to emphasise the continuum of enforceability from purely voluntary initiatives to those with monitored or certified exclusionary standards.

"[W]hilst declarations and joint activities are often met with scepticism by observers because of their lack of 'teeth' or because of their perception of being so much 'window-dressing', they are an essential part of getting the key actors around a negotiating table, building confidence and trust between them, and establishing the rules of the game."[26]

With hindsight based on the Collective Action experience since 2013, it now appears that the pyramid does not reflect the current status quo of the Collective Action ecosystem as it categorises Collective Action initiatives into a hierarchical structure, with the spot at the top taken up by the Integrity Pacts.

The B20 Task Force study did caution that boundaries between the categories may be fluid and a Collective Action initiative may develop over time and shift categories, and it underscored that one category or approach is not necessarily superior to the other. Nevertheless, the pyramid creates an impression that certification and enforceability are the pinnacle of efforts – in terms of desirability and effectiveness. But this ignores the precept that there is no hierarchy or superiority, as not all circumstances lend themselves to multi-stakeholder initiatives or Integrity Pacts.

26 Ibid. at page 6.

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